

JP:DAL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

M 11-1095

X

UNITED STATES OF AMERICA

- against -

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF AN  
APPLICATION FOR  
ARREST WARRANT

DANNY ARMANDO LUNA,  
also known as  
"Carlos Luna" and  
"Carlos DeJesus,"

(18 U.S.C. § 1542)

Defendant.

X

EASTERN DISTRICT OF NEW YORK, SS:

JOHN PAGE, being duly sworn, deposes and says that he is a Special Agent with the Department of State, Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

On or about May 13, 2010, within the Eastern District of New York, the defendant DANNY ARMANDO LUNA, also known as "Carlos Luna" and "Carlos DeJesus," did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws.

(Title 18, United States Code, Section 1542).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. I am a Special Agent with DSS and have been so for three years. I am familiar with the facts and circumstances set forth below from my personal involvement in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On or about May 13, 2010 the defendant DANNY ARMANDO LUNA, also known as "Carlos Luna" and "Carlos DeJesus," applied for a U.S. Passport at the Jackson Heights Station Post Office in Queens, New York. On the application, form DS-11, the defendant stated that his name was "Edwin Torres Flores" and supplied a date of birth, place of birth and social security number as his own. In support of his application, the defendant presented a Puerto Rican birth certificate and New York State driver's license in the names of Edwin Torres Flores.

3. During the course of verifying the information provided by the defendant, a United States Department of State fraud prevention manager reviewed the defendant's passport application and found that it included a number of fraud indicators. Among other things, the defendant had spelled his

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

purported last name differently on parts of the application and had not included emergency contact information or information regarding his travel plans.

4. State Department agents subsequently contacted the defendant DANNY ARMANDO LUNA, also known as "Carlos Luna" and "Carlos DeJesus," who agreed to be interviewed in person on June 28, 2010, at a passport office in New York. During the interview, the defendant admitted to having an extensive criminal history, and to having used the aliases "Danny," "Carlos" and "Dejesus" in the past. The defendant stated that he had a sister named "Maria" and a brother named "Felipe." The defendant agreed to be fingerprinted and photographed.

5. The defendant's fingerprints were subsequently found to match those of an individual named "Danny Armando Luna," also known as "Carlos Luna" and "Carlos DeJesus," with an extensive criminal record in the United States.

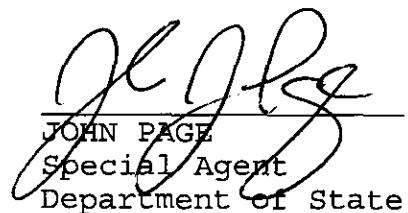
6. State Department agents have obtained records from the Puerto Rico Demographic Registry for Edwin Torres Flores, with the same date of birth and social security number supplied by the defendant on his passport application. Those records indicate that Edwin Torres Flores has seven siblings, none of whom are named "Maria" or "Felipe."

7. Agents have also interviewed Edwin Torres Flores' mother. During the interview, agents showed Ms. Flores pictures

of Edwin Torres Flores' siblings. Ms. Flores accurately identified the photographs as pictures of her children and produced photographs of her own depicting the same individuals.

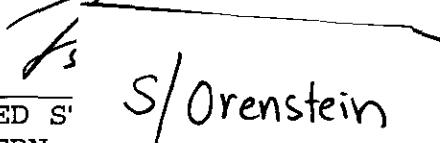
8. Agents showed Ms. Flores a photograph of the defendant DANNY ARMANDO LUNA, also known as "Carlos Luna" and "Carlos DeJesus," whom she could not identify. Ms. Flores produced a picture of her son, Edwin Torres Flores, which depicted an individual different from the defendant.

WHEREFORE, your deponent respectfully requests that the defendant DANNY ARMANDO LUNA, also known as "Carlos Luna" and "Carlos DeJesus," be dealt with according to law.



JOHN PAGE  
Special Agent  
Department of State

Sworn to before me this  
4th day of November, 2011



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UNITED S<sup>t</sup>EATERN